



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

May 15, 2024

BY ECF

Honorable Paul A. Engelmayer
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1305
New York, NY 10007

Re: *The Intercept Media, Inc., et al. v. National Park Service, et al.*,
23 Civ. 10922 (PAE)

Dear Judge Engelmayer:

This Office represents Defendants the National Park Service (“NPS”) and the Department of the Interior (collectively, “Defendants” or the “Government”) in the above referenced Freedom of Information Act (“FOIA”) case.

We write to respectfully request a four-business day extension, from May 17, 2024 to May 23, 2024, of the due date for the Government’s motion for summary judgment. The reason for this request is that despite best efforts, the Government needs additional time to complete the Government’s brief and the accompanying agency declaration in order to provide the Court with a full and accurate record in this matter. This is the first request for an extension of this deadline.

The Court previously so-ordered the summary judgment schedule proposed by the Parties. *See* ECF No. 21. The requested extension would adjust the summary judgement briefings schedule as follows:

May 23, 2024 – Government brief due
June 20, 2024 – Plaintiffs’ opposition brief due
July 4, 2024 – Government reply brief due

Plaintiffs consent to the requested extension, as well as to the adjusted briefing schedule set forth above.

Thank you for your consideration of this matter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Dominika Tarczynska
DOMINIKA TARCZYNSKA
Assistant United States Attorneys
Tel. (212) 637-2748
Fax (212) 637-2686
dominika.tarczynska@usdoj.gov
Attorney for Defendants